

From: [REDACTED]  
Sent: 20 June 2018 10:43:09  
To: Public Engagement Unit  
Subject: FW: Airbnb hosts and guests in Scotland contribute approximately ?500m to the economy

Attachments: Airbnb for Edinburgh.pdf, Airbnb for Glasgow.pdf, Scotland Data Map.pdf

Hi

For MACCS MR please.

Thanks  
[REDACTED]

[REDACTED]  
Office of Minister for Local Government and Housing  
The Scottish Government  
St Andrews House, Regent Road, Edinburgh, EH1 3DG  
Tel. 0131 244 8339

Please see the Ministerial preferences<<http://saltire/my-workplace/ministerial-preferences-and-support/Communities-Social-Security-and-Equalities/Pages/Kevin-Stewart.aspx?pageid=c115f78a-7f38-4a3c-bf96-421a476e6f67>> which may be of assistance to you.

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From: [REDACTED]  
Sent: 15 June 2018 16:19  
To: Minister for Local Government and Housing  
Subject: Airbnb hosts and guests in Scotland contribute approximately ?500m to the economy

Dear Minister,

Airbnb hosts and guests in Scotland contribute approximately ?500m to the economy

Airbnb is delighted to release new data on our top 15 destinations across Scotland for the first time. The findings show that hosts and guests using the platform generated nearly half a billion pounds (?482.9m) of economic activity in Scotland in 2017. This is the first time Airbnb have shared such extensive data on our top tourism destinations in the UK, signifying our commitment to Scottish tourism as one of the nation's most important industries.

Since first welcoming visitors into homes in 2009, individuals across Scotland have embraced the economic, social and cultural value of homesharing and Airbnb hosts take considerable pride in promoting their neighbourhood, local businesses, and sharing the experience of living like a local. Hosts can take advantage of the platform in several ways - sharing a spare room while at home or their entire homes when they themselves go on holiday.

The attached infographic shows that Airbnb is helping to disperse and spread the benefits of tourism throughout Scotland and is becoming a vital component of the country's thriving tourist economy. While properties listed in traditional tourist destinations such as Edinburgh and Glasgow are popular, hosts are also welcoming guests in rural communities, and smaller towns and cities including Oban, Elgin and Ullapool.

As part of a global commitment to transparency with governments, the figures highlight the number of guest arrivals, typical host income, typical number of nights hosted per listing, total economic activity and total numbers of active listings, for each featured region. The new data coincides with the launch of our Office of Healthy Tourism<<https://www.airbnbcitizen.com/airbnb-launches-oht/>> - an initiative to help drive local, authentic and sustainable tourism in countries and cities across the globe.

In 2017 the headline data for Scotland as a whole shows that:

- \* Hosts and guests using Airbnb contributed an estimated £482.9m to Scotland's economy, bringing much needed additional revenue into local businesses and communities across the country.
- \* Hosts in Scotland have earned £113.4m from the platform, with 1.4m people using Airbnb to visit Scotland.
- \* The average Airbnb host in Scotland earned £3,800 from sharing their space, for an average of 44 nights a year, which enables them to generate supplemental income to help make ends meet and support their household and families.

In addition, as our top two destinations in Scotland, we have attached a programme of work detailing how Airbnb can work in partnership with Edinburgh and Glasgow. Please find attached more information on our offer, detailing how together we can help spread the benefits of tourism, be a good partner to communities and ensure that homes are shared safely on the platform

We want to work in partnership with local and national policymakers to promote responsible homesharing, which empowers thousands of families in Scotland with a tool to make everyday life more affordable, connects people, values and cultures, and strengthens communities through sustainable tourism.

If you have any questions regarding our new release, or require any further information, please do not hesitate to get in touch.

Yours sincerely,

[REDACTED]

[REDACTED]

Airbnb

# Edinburgh

640,000

Total guest arrivals

150+

Number of countries of origin of guests

41

Number of nights a typical listing is booked

4,300

Earnings of a typical host (GBP)

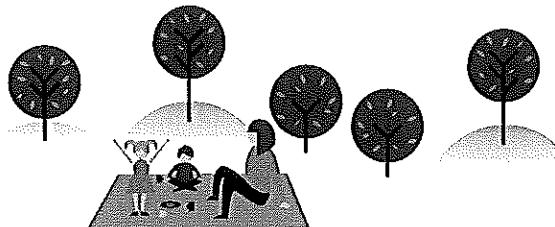
10,500

Number of active listings

## Learn how Airbnb can work with you and your local community

Airbnb is a trusted community marketplace for people to list, discover, and book unique accommodation and experiences around the world — online or from a mobile phone or tablet. Founded in 2008, Airbnb is a global platform with listings in over 191 countries across the world. Connecting people, values and cultures, Airbnb empowers regular people with a tool to make life more affordable.

We are committed to working in partnership with the communities in which we operate. Outlined below are a variety of different programmes we can offer you. We are eager to work with you to ensure that homes are shared responsibly.



### Spreading the benefits of tourism

Putting your city on the map during large scale events

Community Tourism Programme

Airbnb Experiences

### Being a good partner to communities

Disaster Response & Relief Programme

Neighbour Tool

Responsible Hosting Guide for your city

### Ensuring homes are trusted and safe

Championing trust on our platform

Host Guarantee and Host Protection Insurance

Trust & safety events

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## Spreading the benefits of tourism to everyone

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Here at Airbnb, we believe that cultural tourism is about connecting people, values and culture to build authentic travel experiences. We are very proud to play an active role in the continued success of the UK as one of the world's leading tourism destinations.

Working with hosts, businesses and local authorities we have helped create several Cultural Tourism Maps to showcase locals' favourite attractions and businesses in the area. We have recently worked with hosts to produce maps in Edinburgh and Southwark and Waltham Forest in London.

During sporting, music, arts and cultural events, your city may require increased tourism capacity. Airbnb for Events is also an impactful tool designed to help visitors find a place to stay during big events and moments. We have worked in partnership with cultural tourism events such as Hull City of Culture and the 2018 European Championships in Glasgow to serve as the official alternative accommodation partner to encourage residents to open their doors and showcase the city's hospitality outside the traditional tourist hotspots and seasons.

**We would be delighted to explore how visitors and residents can take advantage of all your city has to offer.**

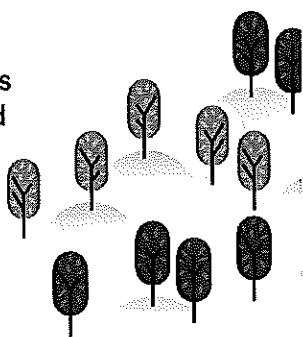
Airbnb launched a Community Tourism Programme in Europe to support pioneering projects in local communities that encourage and empower locals to both shape and benefit from more sustainable tourism. The Programme will fund innovative, community-based tourism projects that promote and look to democratise the benefits of travel across Europe until 2020.

**Please visit [airbnbcitizen.com/about-the-community-tourism-programme](http://airbnbcitizen.com/about-the-community-tourism-programme) for updated information on opening dates if you wish to apply to the programme.**

Airbnb Experiences are activities designed and led by inspiring locals. They go beyond typical tours or classes by immersing guests in each host's unique world. It's an opportunity for anyone to share their hobbies, skills, or expertise. For many people, they may not have spare space to share in their home but they do have a unique insight to share with visitors looking to learn more about a place or connect on an interest.

Within this, Social Impact Experiences allow users to go on experiences with knowledgeable hosts from local non-profits and get to know their causes, with 100% of what they pay going directly to the organisations. Airbnb works with local partners to introduce visitors to the places locals feel most passionate about. With the recent launch of Experiences in Edinburgh, Airbnb partnered with VisitScotland to help facilitate introductions to local businesses, residents and charities - many of which are now seizing the opportunity to share their Experience on the platform.

**We would be delighted to discuss Experiences with local tourism partners to inspire locals to show off their neighbourhood and get visitors involved with causes they care about.**



## Being a good partner to communities

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When disasters strike, we often alert our hosts to help provide temporary accommodation during response efforts. Airbnb automatically contacts hosts and guests to firstly share vital safety information in the impacted and surrounding area, and secondly if required asking if hosts have extra space that they would like to share at no cost to those in need. Partnerships with local and regional governments are key to provide an effective and efficient response in times of disaster. For more information, please visit [airbnbcitizen.com/disaster-response](http://airbnbcitizen.com/disaster-response).

**Our Disaster Response and Relief program is available to support emergency response efforts in your community. For more information on the disaster response and relief programme, please see the Cabinet Office Resilience website.**

Airbnb seeks to address local resident concerns including those raised through our Neighbour Tool – which allows anyone to share specific concerns they may have about a listing in their community. Our team will then review their concern and, if necessary, follow up with the host regarding the issue. In addition, if residents are able to provide the listing's web address, we can then follow up with each resident who has made a complaint. To learn more, visit: [airbnb.co.uk/neighbours](http://airbnb.co.uk/neighbours).

**Share and promote this tool with residents so community disturbances can be investigated by our team directly.**

At Airbnb, we want to help ensure that home sharing grows responsibly and sustainably. We encourage hosts to think carefully about their responsibilities through a Responsible Hosting Page, which outlines in detail what is expected of a host. We are committed to working to ensure hosts on Airbnb are made aware of local rules and we regularly contact hosts on Airbnb to remind them of local regulations. We also developed a Responsible Neighbour Guide for London - a simple guide that hosts can print out and fill in for their guests, to aid in understanding important rules or information about their area.

**We would be delighted to discuss creating a similar guide for hosts and guests in your area.**



## Ensuring homes are shared safely on our platform

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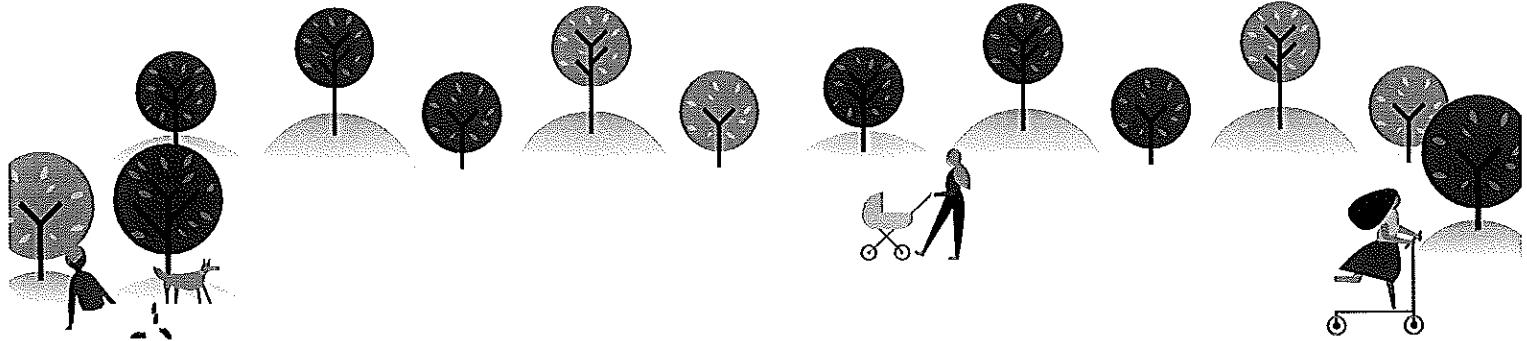
Creating and championing trust is a top priority at Airbnb. Over 300 million guests have had safe and memorable experiences on Airbnb, experiences which rely on receiving a trustworthy service. In 2017, Sharing Economy UK (SEUK) awarded Airbnb its TrustSeal kitemark for successfully meeting a list of Good Practice Principles they established to increase trust in the sharing economy amongst businesses and consumers.

Our Host Guarantee provides up to £600,000 of coverage in case property damage occurs, and our Host Protection Insurance provides liability coverage for Home Sharing and Experiences up to £600,000, for every listing. In the rare event something happens, our global customer service, and trust and safety team, are on call 24/7 in 11 different languages to help make things right for our community.

Safety is our priority and Airbnb has already established successful partnerships with the likes of the National Fire Chiefs Council (NFCC) to help promote guidance to hosts. In an effort to help the community stay safe, Airbnb has been distributing free smoke and carbon monoxide detectors. We have also partnered with RoSPA, Get Safe Online and other experts to highlight key information for hosts. We routinely run safety workshops with hosts and recently held a 'Meet the Experts' event in London to discuss safety issues with hosts on Airbnb. Stay up to date with our latest developments at the Citizen Responsibility Hub.

**We would be delighted to discuss running similar events for hosts on Airbnb in your area.**

If you require any further information, or you are interested in pursuing any of the partnership opportunities outlined above, please contact Marie Lorimer at [marie.lorimer@airbnb.com](mailto:marie.lorimer@airbnb.com).



# Glasgow

100,000

Local people  
involved

163

Number of countries  
of origin of guests

66

Number of nights a  
typical listing is booked

4,100

Earnings of a  
typical host (GBP)

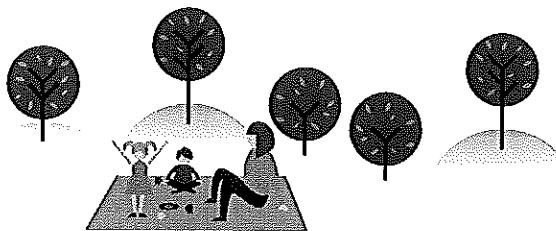
2,700

Number of  
active listings

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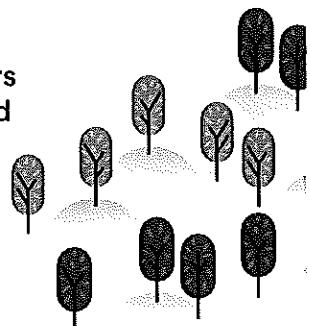
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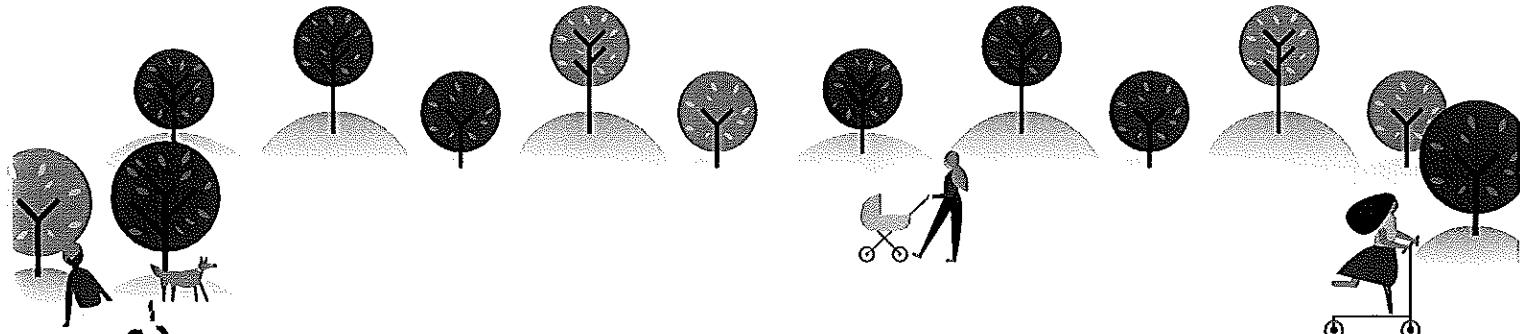
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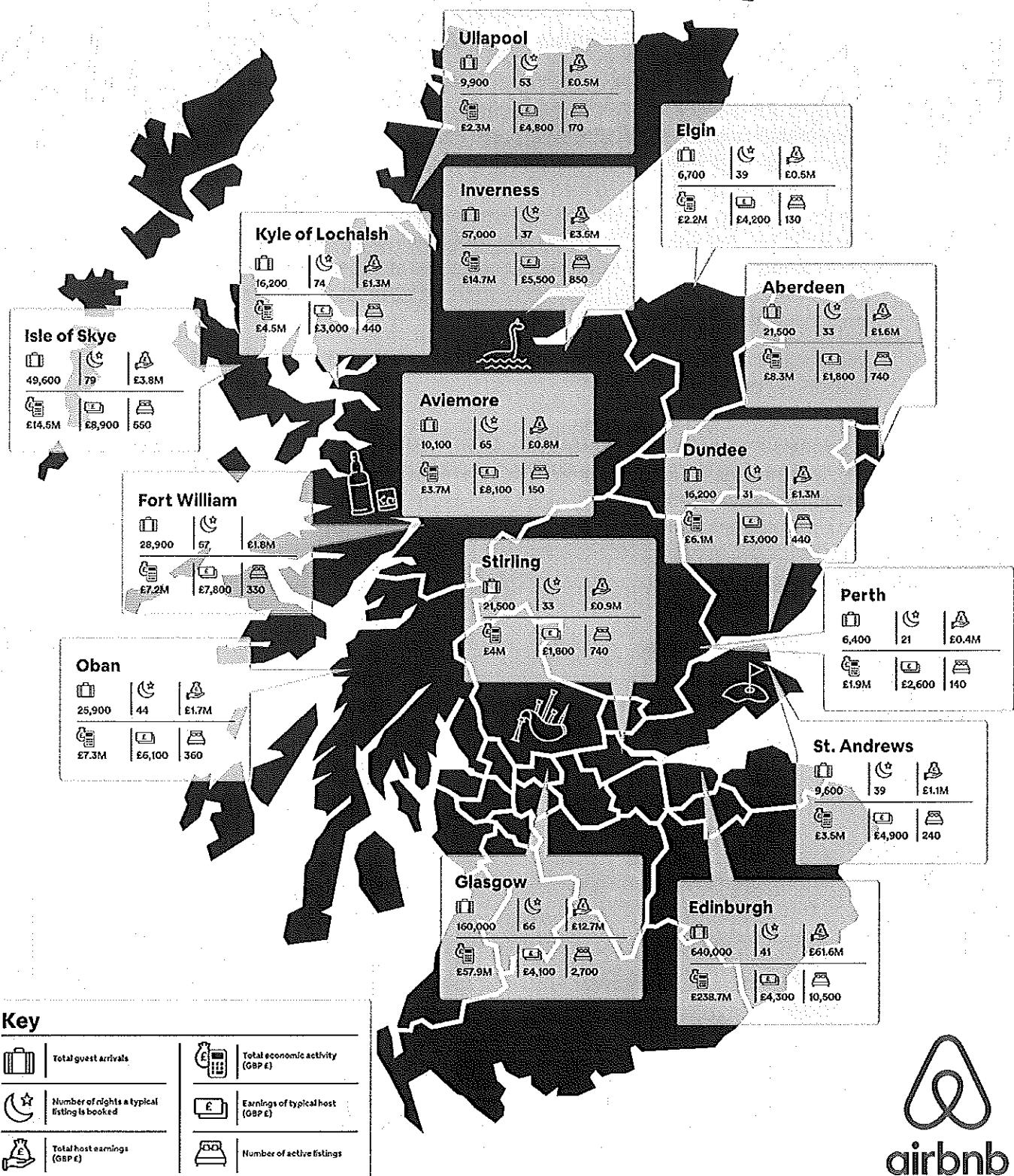
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# Scotland

	1.4M
	44
	£113.4M
	25,200
	£482.9M
	£3,800





T: 0300 244 4000  
E: [scottish.ministers@gov.scot](mailto:scottish.ministers@gov.scot)

[REDACTED]  
Airbnb  
[REDACTED]

Our ref: 2018/0021736

13 July 2018  
[REDACTED]

Thank you for your email and enclosures of 15 June.

I was pleased to see your commitment to "work in partnership with local and national policymakers to promote responsible homesharing"

With their work, the Expert Advisory Panel on the Collaborative Economy has made a significant contribution to our thinking on this. At the strategic level, the Panel identified a need for Scotland to work with new market entrants to develop businesses and platforms that create fair work and wider economic, social and environmental benefits.

The Scottish Government will shortly be publishing our formal response to the Panel. Since the Panel reported the Scottish Government has remained in close contact with local government. This was to consider further evidence and data, council's intentions and aims in addressing the challenges and making use of the opportunities offered by a changing global economy and increasing use of peer-to-peer platforms such as Airbnb.

I would therefore highlight that the issues already raised with us include use of housing and housing supply planning issues, impact on existing tourism businesses (as well as opportunities for new market entrants) the effect on communities of a changed nature of housing use in the areas in question and questions about the regulation and oversight of properties, landlords and customers.

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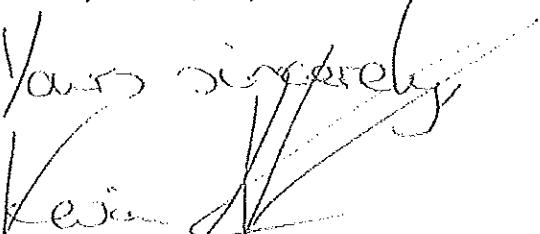
St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)



The Scottish Government recognise though that the collaborative economy can help us in our ambition for sustainable economic development and that we need to address challenges that can be presented as well as harness the opportunities.

Throughout all of this the Scottish Government will seek to ensure that communities are fully engaged in discussions and that their views are heard in this work.

We must do this in order to deliver the fair and socially responsible collaborative economy that we all want for Scotland and I look forward to engaging with Airbnb, and the wider visitor economy in Scotland, to take forward our work on this.

  
Kevin Stewart

KEVIN STEWART

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St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)



## MEETING WITH AIRBNB

Thursday 02 August 2018, Victoria Quay

Present:	[Redacted]	SG More Homes (Chair)
	[Redacted]	SG Tourism
	[Redacted]	[Redacted], Airbnb
	[Redacted]	[Redacted], Halogen PR

1. Meeting requested by Airbnb to discuss further engagement with Short Term Lets Delivery Group (STLDG), as detailed in SG Response to Expert Advisory Panel Advisory Group.
2. Airbnb considered that the SG Response had been a balanced one and were keen to engage with the STLDG – either directly or by helping organise Open/Roundtable Events. Airbnb had also been in discussions with City of Edinburgh Council (CEC) and had noted the publication of the CEC paper re Short Term Lets on 01 August.
3. Airbnb already worked with a number of regulatory authorities across the world and recognised that Edinburgh was unique in the scale of the spike in demand that could occur during festivals and winter festivals. However, they wanted to ensure that there was a proportionate and evidence-based approach taken: they argued that this needed to examine a range of possible options, statutory and non-statutory, including acknowledgement of the best interests of both hosts and the communities they lived in.
4. Whilst acknowledging that there were other platforms, Airbnb were nevertheless keen to be included as a key stakeholder and highlighted the existing work underway by their Home Sharing Clubs in both Edinburgh and Glasgow. This included developing Good Host Charters plus recommending local businesses, restaurants and attractions. This, Airbnb continued, was in addition to their work with CEC (under the aegis of the Short Term Accommodation Association (STAA). [STAA are the trade association for the short term rental sector].
5. SG acknowledged the help that Airbnb could offer and stated that the work of the STLDG had only just begun. The work of the STLDG would be to adopt a whole-system approach starting by establishing the principles and requirements of any intervention before moving on to specific solutions. For example, one principle was to make sure that the housing stock was as fully utilised as possible with the minimum of voided time. Another principle was for a consistent approach across Scotland, where any intervention was needed. Airbnb welcomed that proposed approach, agreeing the need for the wider landscape to be considered.
6. SG noted an important question was whether the arrival of digital platforms had increased the volume of short term letting activity or merely made it more visible. SG assumed Airbnb had information on market share and growth trends and, subject to commercial confidentiality considerations, would be interested in having access to it.

7. Airbnb noted the potential for digital platforms help disperse tourism to new areas and bring economic benefit to these areas, whilst also taking pressure off the more obvious tourist destinations.
8. SG were clear that they would remain keen to involve Airbnb as one of a number of stakeholders and (for example) to look to Airbnb to assist the work by providing relevant data direct to STLDG, rather than from data-scraping. This would, of course, be subject to restrictions of commercial confidentiality.
9. SG noted that the timescale and outputs from the STLDG were not firm at this stage, but SG would be wishing to engage with all relevant stakeholders, including CEC. SG would be considering carefully the proposed amendments to the Planning Bill, the proposals from CEC and any proposals for a tourism levy.

#### **Actions**

10. It was agreed that:

- SG would be in touch with Airbnb at a suitable point in order to meet Airbnb, relevant partner businesses and representative hosts from Home Sharing Clubs, at a roundtable organised by Airbnb.
- SG would organise a separate roundtable for all platforms and Airbnb would be invited to attend.
- Airbnb to provide information about their tenements' charter, Home Share Clubs and other work they do to promote responsible letting and support local businesses.
- Airbnb would consider what further detailed data could be provided in support of the STLDG work, including any information on the market trends for the short term letting sector.

Meeting Ended

Tourism Team  
August 2018

**From:** [Redacted]  
**Sent:** 10 August 2018 16:00  
**To:** [Redacted]  
**Subject:** Airbnb follow-up

Hi [Redacted]

Thank you for taking the time to meet with me last week, it was good to connect with you regarding the newly formed Short Term Lets Delivery Group.

As discussed, please find attached our submission to the expert panel. This is a comprehensive overview of our business in Scotland, which gives detailed indication of our size and composition, our growth and, of course, our regulatory proposal. I hope you find this useful and it would be great to discuss the document in more detail once you've had the chance to review.

To that end, is it useful for us to pencil in a call or meeting in a few weeks? It would be good to discuss how we take the host roundtables forward.

Thanks,  
[Redacted]

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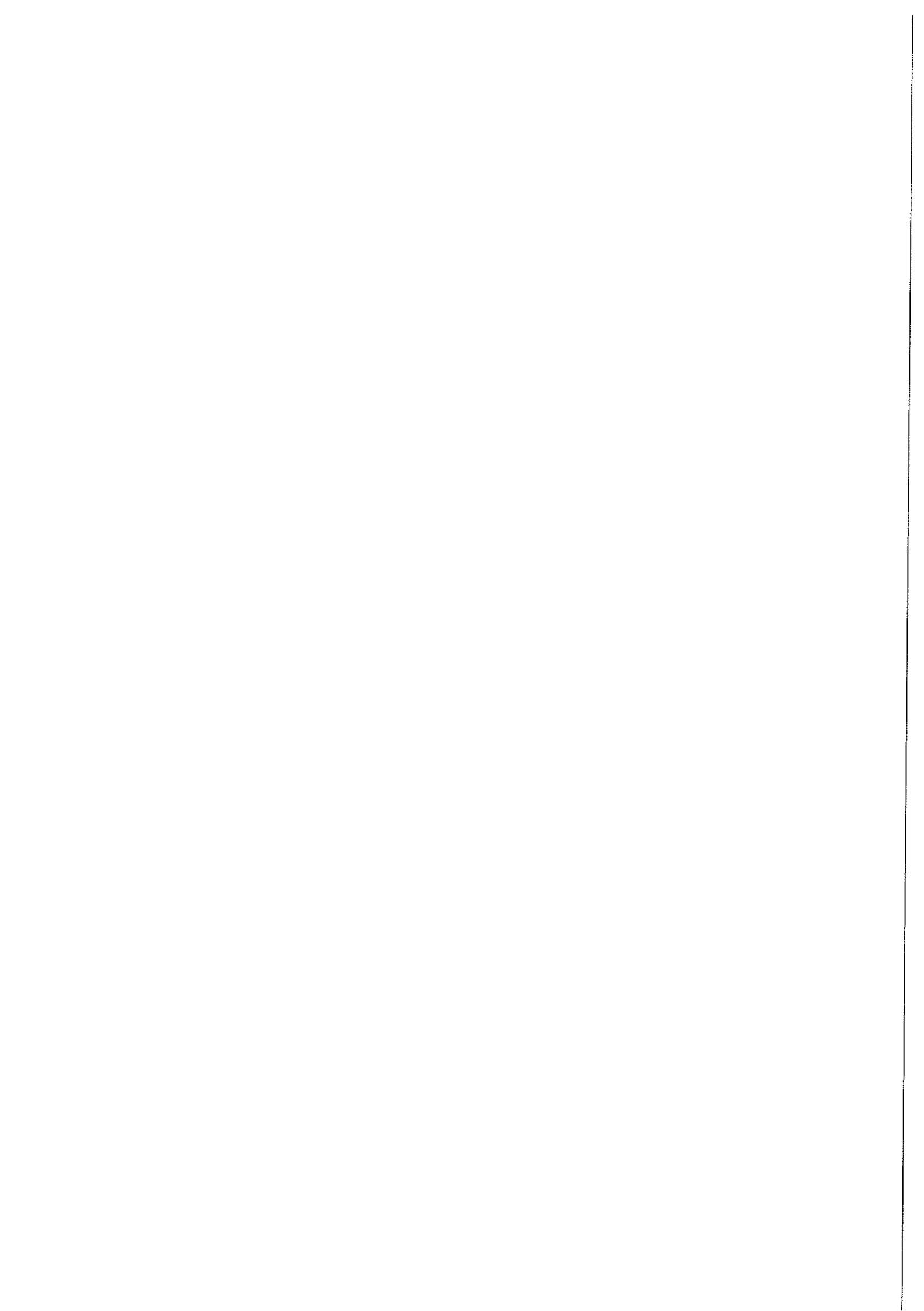


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## Airbnb Position Paper

### The Collaborative Economy and Tourism in Scotland

#### Contents

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2. Overview of the Airbnb Community in Scotland
  - Hosts on Airbnb
  - Listings on Airbnb
  - Guests on Airbnb
3. Recommendations
  - Housing
  - Trust and Safety
4. Conclusion
5. Appendix

1. Introduction
  - 1.1. Airbnb welcomes the opportunity to share the information below with the panel, which we believe will contribute to more informed recommendations to the Scottish Government.
  - 1.2. As you may know, Airbnb is a trusted community marketplace for people to list, discover and book unique accommodation around the world. Travellers (who we call "guests") and providers of accommodation (who we refer to as "hosts") can meet, connect and transact directly with one another. Our platform was first established in San Francisco in 2008 and is now worldwide – with listings on Airbnb hosting guests in 191 countries.
  - 1.3. People across Scotland are increasingly embracing the economic and social value of home sharing, and many hosts on Airbnb take pride in promoting their own neighbourhood and sharing the experience of living like a local.
  - 1.4. We are committed to working in partnership with governments across the world, as they address the challenges and opportunities of the Collaborative Economy.

We understand that the insights we have collated will be made public in December 2017 when the expert report is filed to government, but currently the information below is solely for review of the panel.

## 2. Overview of the Airbnb Community in Scotland

- 2.1. As a matter of principle and practicality, Airbnb believes that policy discussions must be based on sound evidence. We welcome the opportunity to provide accurate data to the panel about the size and composition of our community which puts home sharing in Scotland into context.
- 2.2. Home sharing has economic, social and environmental benefits for individuals and the communities in which they live. We frequently publish data about these impacts, including recent reports about the economic value of home sharing across the UK and in Scotland, some of which is included in this paper.

### Hosts on Airbnb

- 2.3. Most hosts on Airbnb in Scotland are ordinary people who want – for a variety of reasons – to use their space to host visitors and generate some extra income. Hosts have told us this income typically helps contribute to their household costs, to passions and interests, and to support themselves and their families in small but very meaningful ways over and above their existing employment or business activity.
- 2.4. To give a more detailed overview of our community in Scotland:
  - **The average age of a host in Scotland is 48**, five years higher than the national average. In addition, across the UK, women host more than men on Airbnb (62 percent to 38 percent).
  - **A large proportion of our hosts are non-traditional workers.** Almost a third of hosts (32 percent) are self-employed. Senior hosts are increasingly using the platform to earn a supplementary income while out of full-time employment and 15 percent of Scottish hosts are retired.
  - **But, almost a third of hosts in Scotland (29 percent) are in full-time employment.** The Scottish host community work in a variety of different professions, including hospitality (16 percent), health services (10 percent), education (11 percent) and the creative industries (11 percent)<sup>1</sup>.
  - On average, Scottish hosts earn £3,600 a year via the platform.<sup>2</sup>
- 2.5. Over the last year, hosts in Scotland welcomed over 1,000,000 guests into their homes. Below we have detailed some further information on how our community hosts:

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<sup>1</sup> See appendix for more details

<sup>2</sup> UK Insights Report, September 2017, based on data from July 2016-July 2017

- **Hosts in Scotland typically share their space for 38 nights per year**, which equates to 3 nights per month. This is lower than the UK average of 50 nights a year.
- **The majority (59 percent) of hosts across Scotland hosted in their property on Airbnb for under 30 nights a year**. This activity is also reflected in urban markets, including Edinburgh (58 percent).
- A small percentage of our listings in Edinburgh are booked over 90 nights a year (18 percent) and 5 percent of listings are hosted over 180 nights a year.

Nights hosted on Airbnb <sup>3</sup>			
From 1st July 2016 to 1st July 2017			
Number of nights	Scotland % of typical listings	Edinburgh % of typical listings	Glasgow % of typical listings
1-30	59%	58%	49%
31-60	17%	16%	18%
61-90	9%	9%	11%
91-120	5%	5%	7%
121-180	6%	7%	9%
181+	4%	5%	6%

### Listings on Airbnb

- 2.6. Hosts on Airbnb can take advantage of the platform in several ways. Some choose to share their entire home; this may be their primary residence which they rent when they themselves go on holiday, or perhaps it's a second home in the Highlands or on the coast. Others chose to share their home by renting one or two private rooms in their primary residence – perhaps hosts looking to make use of a spare room without committing to a full-time lodger.
- 2.7. When hosts create a listing on Airbnb, they are asked whether it will be offered to guests as an "entire place", a "private room" or a "shared room". Transparency is incredibly important on our platform. Hosts who mis-describe their listings are not just potentially in breach of our Terms of Service, but they will surprise or

<sup>3</sup> Typical listings bucketed by nights hosted. A typical listing is a listing that was active at or before the beginning of the study period. This is a more accurate portrayal of the Airbnb activity over a full year

disappoint guests, resulting in negative feedback that will be seen by other potential guests. Therefore there is no incentive to do so.

2.8. To give an indication on the spread of our listings across Scotland, as of July 1 2017:

- There are 21,900 active listings across Scotland<sup>4</sup>, out of a total 168,000 in the UK.
- The majority (59 percent) of listings in Scotland are entire homes. However, a large percentage (40 percent) of listings in Scotland are private rooms.

Types of Listing on Airbnb in Scotland				
Listing type	Share of listings (As of 1st July 2017)	Year on year growth (01/07/2014 30/06/2015)	Year on year growth (01/07/2015 – 30/06/2016)	Year on year growth (01/07/2016 – 30/06/2017)
Entire Home	59%	78%	94%	55%
Private Room	40%	85%	80%	43%
Shared Room	1%	294%	64%	6%

2.9. The top five destinations in terms of number of listings on Airbnb bridge urban and rural areas. These include (in order of number of listings) the City of Edinburgh, the Highlands, Glasgow City, Argyll and Bute and Fife. Below is further information on the Airbnb community in these areas.

- The Highlands region is Scotland's second most popular listing destination. Listings in the area are now higher than Glasgow, and rose by 81 percent in the past year.
- As of 1st July 2017, Edinburgh has 9,000 listings in the city region. Listings in Edinburgh have grown by an average 43 percent year on year, which is relatively in line with Scotland's top five destinations.

<sup>4</sup> UK Insights Report, September 2017, based on data from July 2016-July 2017

Growth of Airbnb listings					
From 1st July 2016- 1st July 2017					
County	Number of listings 01/07/2014	Number of listings 01/07/2015	Number of listings 01/07/2016	Number of listings 01/07/2017	Growth Year on Year 01/07 2016 - 2017
Argyll and Bute	100	270	640	920	44%
City of Edinburgh	1,900	3,500	6,300	9,000	43%
Fife	100	440	680	910	33%
Glasgow City	1,000	1,100	1,500	2,200	45%
Highlands	280	690	1,700	3,100	81%

2.10. Typical Airbnb hosts are not professionals - they are normal local people who share their homes occasionally and help spread tourism. While the open nature of the platform allows for a wide variety of hosts, including some "traditional" vacation rentals and even boutique hotels, our primary focus is on high-quality, unique properties that complement existing forms of accommodation. This is reflected in our Scotland community:

- In our top five Scottish destinations (as above), more than three quarters of hosts (78%) have one listing on the platform, with 92% of hosts sharing their space in 1-2 listings.
- Hosts with multiple listings are in the absolute minority of our platform. Hosts with 5+ properties account for just 2% of our total host community in Scotland. However, this also indicates an interest from the more traditional players in using the platform as a new channel to consumers.

Number of hosts per number of listings in Scotland	
In top 5 destinations (as of 1st July 2017 in Scotland)	
Number of listings	% of hosts
1	78%
2	14%
3	4%
4	2%
5	1%
6+	1%

2.11. It is important to quantify how the data we have provided on our listings sits within the context of the wider housing market in Scotland. We are aware of a number of attempts to analyse Airbnb in Scotland by extrapolating or tabulating figures “scraped” from our website. This often leads to inaccurate conclusions about the nature and impact of our community in Scotland.

2.12. Looking at the total number of entire home listings in any given area is not necessarily an indication of impact on long-term housing. Very few of those listings would likely be available on the long-term housing market, aside from Airbnb. An entire home is very often – but not always – already the home of the host. They are offering their entire home to guests while they are themselves away. Thus, an “entire home” listing on Airbnb is not necessarily a property that would be available for long-term rental under other circumstances.

2.13. Some properties – such as “granny flats” within a property – are sometimes classified by their hosts as an “entire home” as they are self-contained, often with their own means of entry and exit. These would also not necessarily be available for long-term rental. Equally second homes are another big segment used for occasional home sharing activity due to the flexibility it affords.

2.14. Some hosts choose to offer both options to guests: offering their home as an entire home when they are not around, and also offering a private room (or rooms) when they are there. Such a choice would result in more than one listing being visible on the Airbnb website.

2.15. A host who appears to have multiple listings may be managing these on behalf of other home-sharers, they may be a professional lettings business, or may be offering multiple spaces in a single property. A host with multiple listings may not therefore necessarily be providing a “professional” service.

2.16. However, looking more closely at occupancy in Scotland confirms the picture of a largely non-professional community of hosts. However, we would like to work with government to explore some sensible long-term solutions that provide clarity and certainty for hosts – both professional and non-professional – about their obligations under the planning regime.

2.17. It is worth considering whether, and to what extent, the growth of short-term rentals is having an impact on communities in certain cities – in particular Edinburgh. We will explore this theme more in our ‘Recommendations’ section below.

### Guests on Airbnb

2.18. Just like hosts on Airbnb, guests have distinctive characteristics too. They differ from typical visitors and many have stated would not have travelled or stayed in the UK as long were it not for Airbnb.

2.19. As shown in our recent UK Insights Report<sup>5</sup>, the ‘staycation’ is becoming increasingly popular across the UK. Scotland stands to benefit from this growing trend and is now the most popular destination in the UK for domestic travellers. But Airbnb in Scotland also continues to attract guests from around the globe. Over half the guest arrivals (56 percent) were international travellers. With this, comes a significant economic boost for the local community:

- The total economic activity generated by hosts and guests amounted to £499 million.
- A 104 percent inbound guest growth rate resulted in guests spending an estimated £1.4 million per day in Scotland over the past year.
- Edinburgh was the most popular destination in Scotland for guests in the past year, with 496,000 arrivals in the city.

Total guest arrivals	
July 1st 2016 and July 1st 2017	
Destination	Guest number
City of Edinburgh	496,000
Highland	175,000
Glasgow City	114,000
Argyll and Bute	39,000
Fife	25,000

<sup>5</sup> UK Insights Report, September 2017, based on data from July 2016-July 2017

2.20. Our platform helps to make the UK's top events even more accessible. In Scotland, visitors will often use an attraction like the Edinburgh Fringe Festival or the Edinburgh International Festival to travel further in the country.

2.21. Top events can drive visitors to destinations at certain times of the year. Below is some more information on when guests travel to Scotland (broken down by quarter):

- 45 percent of Airbnb guests travelled to Scotland July-September last year.
- April-June and October-December both had a consistent amount of visitors, amounting to 23 percent and 22 percent respectively.

Total guest arrivals - per quarter	
2016	
Time period	Guest arrivals
2016-Q1	9%
2016-Q2	23%
2016-Q3	45%
2016-Q4	22%

### 3. Recommendations

3.1. At Airbnb, we want to help ensure that home sharing grows responsibly and sustainably. We have considerable experience in working with governments across the world to look at how regulations can be designed and applied to new forms of accommodation. Consistent with our global commitments to engage directly in dialogue with governments, Airbnb has been in contact with the Scottish government and local authorities regarding our impact across the country.

3.2. We understand it is important for the government to ensure a fair degree of guardrails are in place to ensure short-term lets remain at a sustainable level in Scotland. We have described a number of recommendations below which outline potential solutions to local challenges, including a programme of work across Scotland and a tailored solution for short-term lets in Edinburgh.

3.3. From our conversations to date, we understand there are two primary challenges to address: dealing with higher visitor volumes and misappropriation of housing stock, and issues of trust and safety in the community. Below we have taken this opportunity to frame suggestions on potential solutions to these issues.

## Housing

- 3.4. In our discussions with Government and local authorities in Scotland, our understanding is that we share the goal of focusing on establishing clearer and evidence-based boundaries between the kind of non-professional home sharing that has negligible measurable impact on housing supply (and which provides significant positive externalities in terms of economic impact and increased tourism capacity at times of need), and professional lettings that could, under certain circumstances, be putting pressure on supply in specific areas of the most housing-constrained cities.
- 3.5. We want to ensure that appropriate guardrails are in place to ensure short-term lets remain at a sustainable level for Scotland. From our conversations, we recognise that Edinburgh City Centre faces with particular pressure as a result of significant visitor volumes.
- 3.6. Airbnb's experience in other cities may provide some useful reference points to demonstrate our path towards a potential solution for Edinburgh City Centre.
- 3.7. Cities such as Amsterdam, London, Philadelphia and Hamburg have established clear legal frameworks that recognise the occasional use of residential property as tourism accommodation and set clear boundaries between activity that does not require permission, and that which does.
- 3.8. In London, "change of use" permission is required only after a property has been rented out for more than 90 cumulative days in a calendar year. Short-term rentals are permitted in any residential building that is subject to local property tax (Council Tax), and there are separate use classes for full-time short-term rental activity – such as serviced apartments and aparthotels.
- 3.9. In Amsterdam, a primary home (again, defined by law) can be shared as an entire home for up to sixty nights in a calendar year. Beyond that (very low threshold), a "short stay" licence is required, or a bed and breakfast permit. Private room rentals are not subject to limits.
- 3.10. In Hamburg, "change of use" permission is only triggered if a host is sharing more than 50% of their home for the whole year, or their entire home for more than 50% of the time.
- 3.11. In Philadelphia, residents may share their homes for up to 90 nights without registering, regardless of whether they own, rent or have multiple properties. After 90 nights, hosts must seek permits from the city to share their homes for between 91 and 180 days per year. A Commercial Activity License is required for hosts looking to rent their homes for more than 180 nights per calendar year, or who are trying to rent a property that is not a primary residence.
- 3.12. Other jurisdictions – more heavily reliant on tourism – have taken different approaches. In parts of Italy, the boundary of professional and non-professional activity typically relates to the number of properties that the owner rents out. Portugal and Greece have established updated tourism regulations that provide

clarity to both professional and non-professional hosts about the rules that apply to them.

- 3.13. In some places where home sharing rules have been clarified, Airbnb has agreed to work in partnership with governments to help hosts to understand and follow those rules.
- 3.14. In Amsterdam and London, for instance, we have introduced automated systems which limit hosts with entire homes to the night limits established in the underlying legislation. Where the relevant permissions have been granted by a local authority, or in cases where hosts are exempt from those rules (for instance, if they are hosting in a self-contained space that still forms part of their home), they have routes to notify us so we can allow them to continue hosting.
- 3.15. This spring, we introduced automated systems in Barcelona which limit hosts on Airbnb in the most congested area of the city, Ciutat Vella. Hosts are limited to sharing only one entire-home listing unless they are professional operators and share their business details on their Airbnb profile.
- 3.16. We recognise that every city is different and therefore needs to approach challenges in different ways in order to effectively address relevant local concerns. Factors such as tourism demand, population density, trends in the private rental sector, local land use laws and other legal frameworks, and cultural variances make it impossible to propose a single set of regulations that would be appropriate for everywhere. As such, we understand that in Scotland, Edinburgh in particular faces a unique set of challenges.
- 3.17. As outlined from the data we have shared, Airbnb works in complement to Scotland's thriving tourism industry. We support Edinburgh's status as a global Festival City and international tourist destination with our platform allowing Scotland's top events to be even more accessible. We have worked in partnership with cultural tourism events such as the Edinburgh Fringe Festival to increase tourism capacity during peak season and, in 2015, Airbnb was named as the festival's official accommodation partner<sup>6</sup>. The city's other major cultural flagship events such as the Edinburgh International Festival and seasonal celebrations like Hogmanay mean there is, and will continue to be, a requirement for increased tourism capacity during certain times of the year.
- 3.18. However, we recognise the concerns around unwelcome commercial short-term letting activity in the city, rather than hosts who list their primary residence or spare room. As a company and a community, we have an obligation to proactively address this challenge.
- 3.19. Balancing these two factors, we have explored a potential policy approach that balances Edinburgh's unique needs during periods of very high demand, and the

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<sup>6</sup> Airbnb Announced as Official Accommodation Partner of the Edinburgh Festival Fringe 2015, [Edinburgh Fringe Festival](#), 14.05.2015

rest of the year when occupancy rates are similar to other major cities. We would welcome the introduction of this approach as set out below.

- 3.20. Given the concentration of concern in Central Edinburgh (EH1) we believe that a targeted approach, focusing on the most central areas of the city will be most appropriate - and will limit the unintended consequences of a more blanket approach.
- 3.21. Central Edinburgh experiences a unique - and predictable - peak in demand for accommodation capacity, which cannot be managed through traditional accommodation alone. These seasonal "spikes" represent an opportunity for Central Edinburgh to house very large numbers of visitors in a way that allows local residents to benefit. These periods would include the month of August, and the month around Christmas and Hogmanay.
- 3.22. Outside these periods, we recommend that home sharing is permitted in Central Edinburgh for up to 90 nights per year without formal registration with the council. If hosts wish to provide accommodation more frequently, there should be a process that allows Edinburgh City Council to maintain appropriate oversight of this activity. Beyond Edinburgh City Centre, we believe that existing planning regulations should be sufficient to allow authorities to enforce "change of use" restrictions.
- 3.23. It is crucial that this approach should apply equally to *all* providers of - and platforms for - short term accommodation in the City. It is important to bring the whole short-term rental industry into scope. For our part, Airbnb is exploring what we could do to implement automated solutions that could ensure that hosts abide by new rules. For example, we could limit properties in Central Edinburgh that allow short term letting (outside of seasonal tourism "spike" periods) for more than 90 days from using the Airbnb platform unless they have appropriate permission to do so.
- 3.24. We believe that such an approach would continue to allow home sharers to attract guests all year round, generating the associated economic benefits for local areas beyond the densest parts of the City, while also ensuring that the Council has visibility on situations where properties are being used commercially, potentially preventing the long term use of accommodation by Edinburgh residents. During the busiest parts of the year, it will provide much-needed accommodation that gives guests the widest possible choice of places to stay.
- 3.25. We are happy to discuss this proposal in more depth with the Scottish Government and the City of Edinburgh Council.

## Trust and safety

3.26. Airbnb is committed to fostering trust between our guests, hosts, neighbours and governments to ensure that our community has safe and positive experiences while using the platform. To do this, we have built tools and procedures that empower hosts and guests to make safe decisions about how to interact with one another. Hosts are empowered to welcome thoughtful and respectful guests, and they always have the final say about who they invite to share their home. Key tools to achieve this include:

- Identity verification
- Responsive 24/7 customer service
- Secure messaging
- Peer-to-peer reviews and feedback
- Host Guarantee and Host Protection Insurance
- Responsible host and guest initiatives
- Safety programmes in a number of countries
- Compliance with laws and regulations

3.27. We want to be a good partner to cities and the communities in which we operate and are committed to ensuring that home sharing continues to work for all. While the overwhelming majority of Airbnb guests are respectful travellers, we always want to do everything we can to help ensure that the Airbnb community of users are good neighbours. Incidents of anti-social behaviour are incredibly rare on Airbnb.

3.28. In 2016, there were more than 30 million trips at Airbnb listings worldwide. Significant property damage (claims that were reimbursed under our Host Guarantee program for over \$1,000) was reported to us 0.009% of the time. At that rate, you could host a new reservation every single day for over 27 years without expecting to file a significant property damage claim under our Host Guarantee.

3.29. Anyone can share specific concerns about a listing in their community through our 'Neighbourhood Hotline' tool which can be accessed online at [airbnb.com/neighbours](http://airbnb.com/neighbours). Our team will then review their concern and, if necessary, follow up with the host regarding the issue. We have had conversations with local authorities and MSPs to discuss how best we can share this tool with government and local authorities so community disturbances can be investigated by our team.

3.30. In 2016, Airbnb proposed a "three strikes" policy barring using our platform if they are cited by law enforcement for violating home sharing rules or other restrictions that are intended to preserve neighbours' quality of life. Under this policy, hosts who repeatedly receive complaints from local authorities will be either suspended or banned from using Airbnb. We are eager to explore the feasibility of implementing this policy in Scotland and to work with local authorities who can

provide information regarding complaints to us on an informed basis. This will ensure that we can take action to remove inappropriate actors from our platform.

- 3.31. Airbnb is committed to working to ensure hosts on Airbnb are made aware of local rules and we regularly contact hosts on Airbnb to remind them of local regulations. In London, we have recently produced a Responsible Neighbourhood Guide. Hosts can print out and fill in this form for their guests, to aid in understanding important rules or information about their area. This includes details such as where to put the rubbish, any neighbour sensitivities, and reminding them to keep noise levels to a minimum.
- 3.32. We are currently exploring options with other towns and cities across the UK on how we can support neighbourhoods and local communities. We have agreed with Edinburgh City Council to produce a similar neighbourhood guide for the city and if it would be of interest to the Scottish Government, we would be delighted to discuss what a similar partnership across Scotland might look like.
- 3.33. In addition, we have given out 25,000 free smoke and carbon monoxide detectors to hosts and have made it easy for guests to know who to call if there is an emergency by providing hosts with online safety cards containing important information – such as emergency phone numbers, locations of fire extinguishers, and fire alarms, as well as emergency exit routes.
- 3.34. Airbnb has already established successful partnerships with the likes of the National Fire Chiefs Council (NFCC) to help promote critical guidance to hosts. In addition, we provide information that strongly encourages hosts to ensure their home is properly ventilated and that they provide fire extinguishers and other safety equipment as necessary. If guests alert us to a hazard or safety issue at a listing, we take action, suspending and investigating the listing.
- 3.35. However, if there are increasing concerns around trust and safety, there are actions to which we can commit to taking. We are willing to partner with local authorities to assist them with information dissemination to our hosts and guests, organise meet ups between our community and public authority officials, and to outline appropriate guardrails at one of our 'Meet the Experts' events.

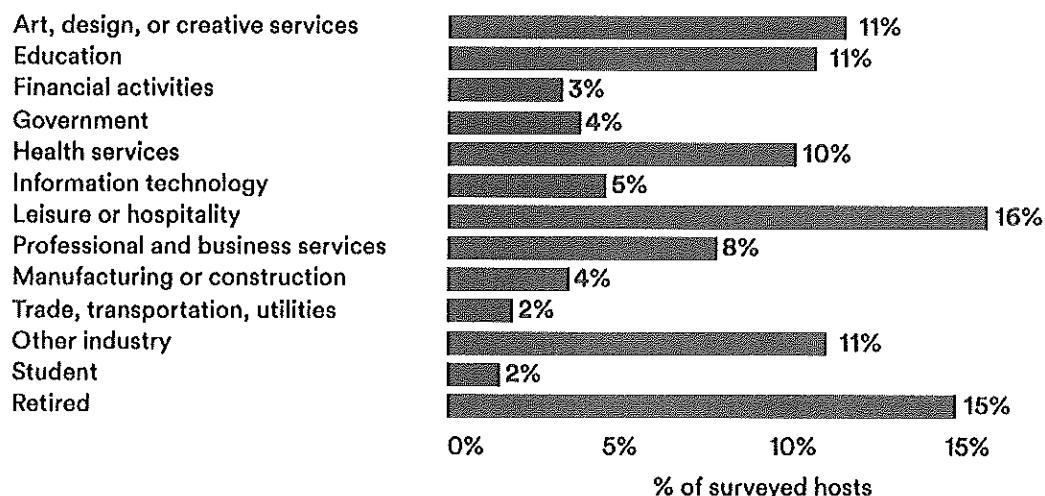
#### 4. Conclusion

- 4.1. Airbnb has worked with more than 300 government across the world and we will continue to encourage local policymakers to work with us to help create clear policy solutions and guidance for local hosts. We would welcome the opportunity to put in place a proposal for Central Edinburgh as set out above in collaboration with City of Edinburgh Council.
- 4.2. We have found that the most effective industry self-regulatory solutions are underpinned by clear regulatory positions that apply to everyone engaged in the market. While Airbnb is one of the most high-profile brands in the home sharing and short-term rental space (alongside others, such as Priceline/Booking.com, Expedia/Homeaway), there are countless other websites, marketplaces, bulletin boards and offline rental agencies engaged in the business of connecting guests with places to stay. The whole short-term rental industry should be kept in focus, and the policy solutions under consideration should be appropriate for the full spectrum of rental activity.
- 4.3. We thank the panel for the opportunity to provide this information and hope that it is useful to understand our business in Scotland.

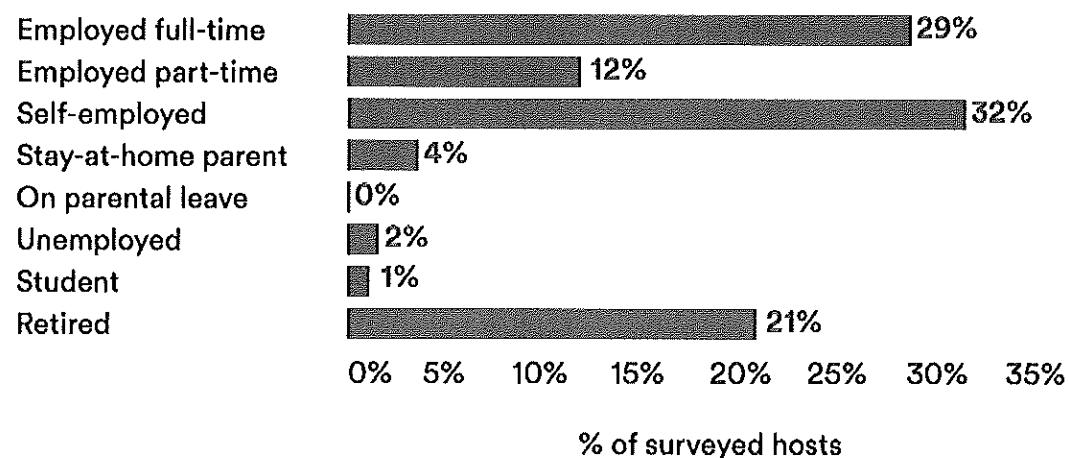
## 5. Appendix

### Information on employment industry and employment status of hosts in Scotland

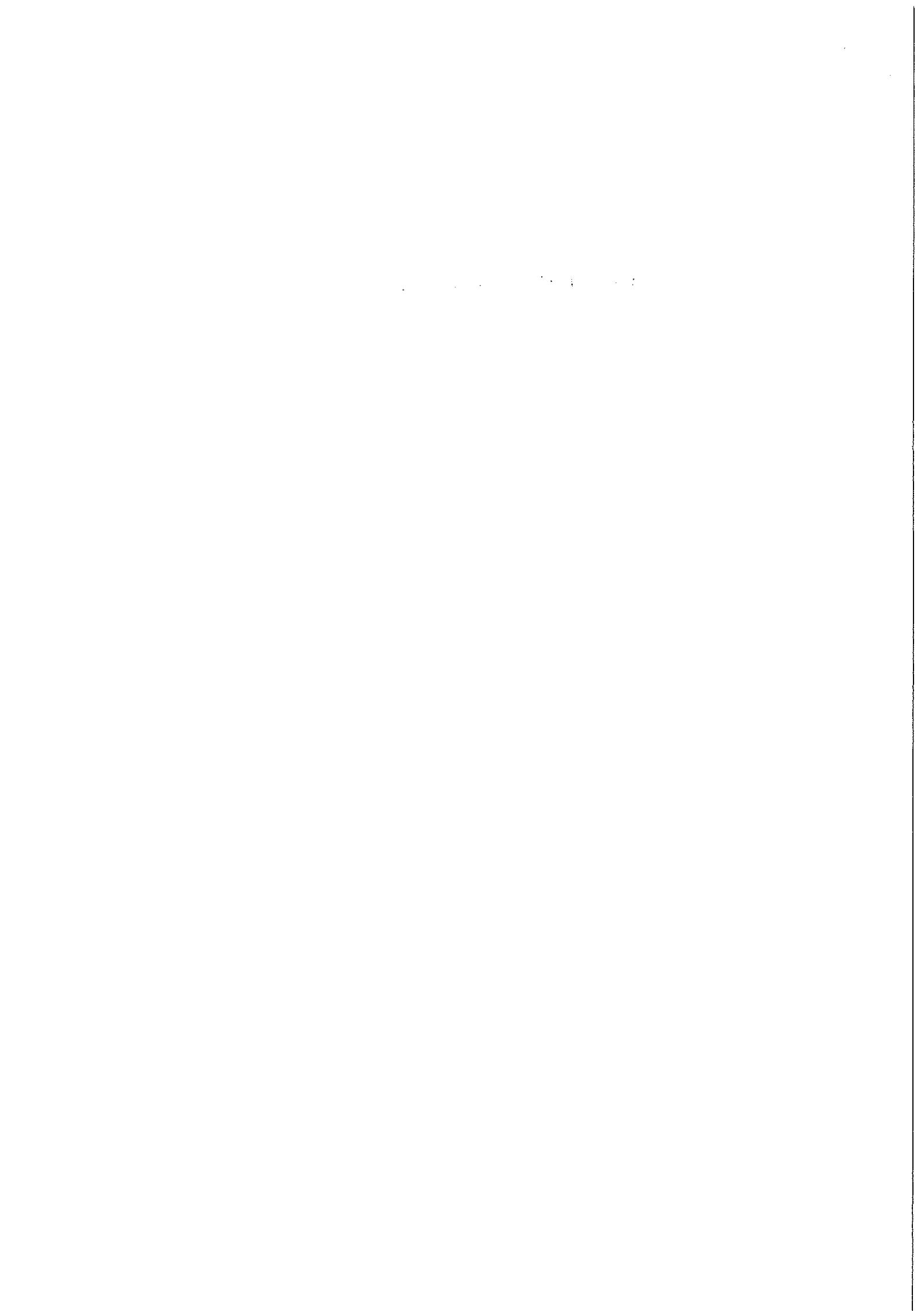
#### Employment industry



#### Employment status



November 2017



From: [REDACTED]  
[REDACTED] 31 August 2018 09:28:58  
To: Public Engagement Unit  
Cc: Minister for Local Government, Housing and Planning, [REDACTED]  
[REDACTED]  
Subject: FW: Your response from Kevin Stewart MSP  
Attachments: Airbnb letter to Kevin Stewart 30.08.2018.pdf

Hi can this be added to MACCS fast track

[REDACTED] coping you in due to the mention of planning bill amendments in the letter

Thanks

[REDACTED]  
Office of Minister for Local Government, Housing & Planning  
The Scottish Government  
St Andrews House, Regent Road, Edinburgh, EHI 3DG  
Tel. 0131 244 3893

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From: [REDACTED]  
Sent: 30 August 2018 20:10  
To: [REDACTED]  
Cc: Minister for Local Government, Housing and Planning  
<MinisterLGH@gov.scot>; [REDACTED] @halogencom.com>  
Subject: Re: Your response from Kevin Stewart MSP

Dear Minister,

Please find attached Airbnb's response to your letter. I hope to meet with you in due course.

Best,  
[REDACTED]

On Fri, Jul 13, 2018 at 12:02 PM,  
[REDACTED] @gov.scot... [REDACTED] @gov.scot>> wrote:  
Dear [REDACTED]

Please see attached correspondence on behalf of Kevin Stewart, Minister for Local

## Government, Housing and Planning.

Many thanks

St Andrews House, Edinburgh, EH1 3DG  
0131 244 7704

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[[http://assets.airbnb.com/images/email\\_signature/Airbnb-sig.png](http://assets.airbnb.com/images/email_signature/Airbnb-sig.png)]



Dear Minister,

Thank you for your response to my email (13<sup>th</sup> July). In the time that has passed since receipt of your letter, Airbnb have continued to engage with both national and local government on discussions around the regulation of short-term lets in Scotland and our work to promote responsible and sustainable homesharing.

Airbnb were greatly encouraged by the balanced and considered response from the Scottish Government to the recommendations of the Expert Advisory Panel on the Collaborative Economy. The Scottish Government have clearly articulated the benefits of the collaborative economy to Scotland and we welcome the evidence-based approaches and industry engagement.

Following on from the Scottish Government's response, we have already reached out to your colleague [REDACTED], who leads the new Short-Term Let Delivery Group at the Scottish Government, and held a meeting with him on 2<sup>nd</sup> August. We were keen to engage with the Delivery Group at the earliest possible opportunity to demonstrate our commitment to be part of and inform the policy process, to highlight our proactive policy recommendations on homesharing, and to work with the Scottish Government as you take forward your programme of work on this important issue.

With that in mind, we would appreciate the opportunity to meet with you as there have been a number of developments since our first correspondence that directly pertain to your Ministerial responsibilities, including: the publication of amendments to the Scottish Government's Planning (Scotland) Bill that would affect short-term lets in Scotland; as well as a report from City of Edinburgh Council setting out their preferred policy approach from the Short Term Lets Working Group on the introduction of a licensing scheme through regulations under the Civic Government (Scotland) Act 1982.

We appreciate that you will have numerous commitments on your time. My office will be in touch with yours to secure a meeting.

Airbnb are fully committed to working collaboratively toward fair and innovative homesharing rules because it is the right thing to do. Airbnb has already worked with more than 500 local and national governments throughout the world to develop homesharing rules to help spread the benefits of tourism to everyone. We want to work with the Scottish Government, the Delivery Group, and City of Edinburgh Council to devise proportionate regulations that balance the needs of local communities and Scotland's flourishing tourist economy.

I anticipate your response.

Yours sincerely,

[REDACTED], Airbnb [REDACTED]

[REDACTED]

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From: [REDACTED]  
Sent: 30 August 2018 20:02:54  
To: Derek.Mackay.msp@parliament.scot  
Cc: scottish.ministers@gov.scot, [REDACTED]  
Subject: Airbnb letter to Derek Mackay

Attachments: Airbnb to Derek Mackay 30.08.2018.pdf

Dear Cabinet Secretary,

Please find attached a letter from Airbnb - I hope to meet with you at your earliest convenience.

Best,  
[REDACTED]

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Dear Cabinet Secretary,

I am contacting you in order to request a meeting to discuss the economic impact of Airbnb in Scotland.

Airbnb is committed to working in partnership with governments across the world as they address the challenges and opportunities of the Collaborative Economy. As part of our engagement with the Scottish Expert Advisory Panel, we proposed options to consider for new regulations for all short-term rentals which would help provide clarity and legal certainty on how local families could use their homes. We were greatly encouraged by the balanced and considered nature of the Scottish Government's recent response to the recommendations from the Expert Panel.

Given your portfolio responsibilities, we would appreciate the opportunity to brief you on how our platform benefits the Scottish economy. We recently released data on our top fifteen destinations in Scotland, highlighting that hosts and guests using Airbnb contributed an estimated £482.9m to Scotland's economy in 2017, bringing much needed additional revenue into local businesses and communities.<sup>1</sup> This was the first time Airbnb shared such extensive data on our top tourism destinations in the UK, and signifies our commitment to Scottish tourism as one of the nation's most important industries.

As our figures show, Airbnb is becoming a vital component of the country's thriving tourist economy. In that context, we welcomed your recent article<sup>2</sup> outlining your economic priorities, which referred to Scotland's place as "a destination of choice for tourism", and the importance you attach to engaging with industry.

Airbnb want to enable people in Scotland share their homes responsibly – thereby helping to disperse and spread the benefits of tourism across the country – and are committed to being good partners in the cities where we operate. Throughout the process of the Scottish Expert Advisory Panel and beyond, we have sought to engage constructively with the Scottish Government – across a number of its Directorates – and we would welcome the opportunity to continue this positive dialogue with you in order to work together on shared goals of making Scotland a better place to live, work and visit.

We would be extremely grateful for your time at a date of your earliest convenience.

Yours sincerely,

<sup>1</sup> <https://www.airbnbcitizen.com/airbnb-debuts-top-15-locations-across-scotland/>

<sup>2</sup> <https://blogs.gov.scot/scotlands-economy/2018/07/09/2574/>

## MEETING WITH AIRBNB

11 September 2018, Telephone catch up

Present: [Redacted] SG [Redacted]  
[Redacted] [Redacted], Airbnb

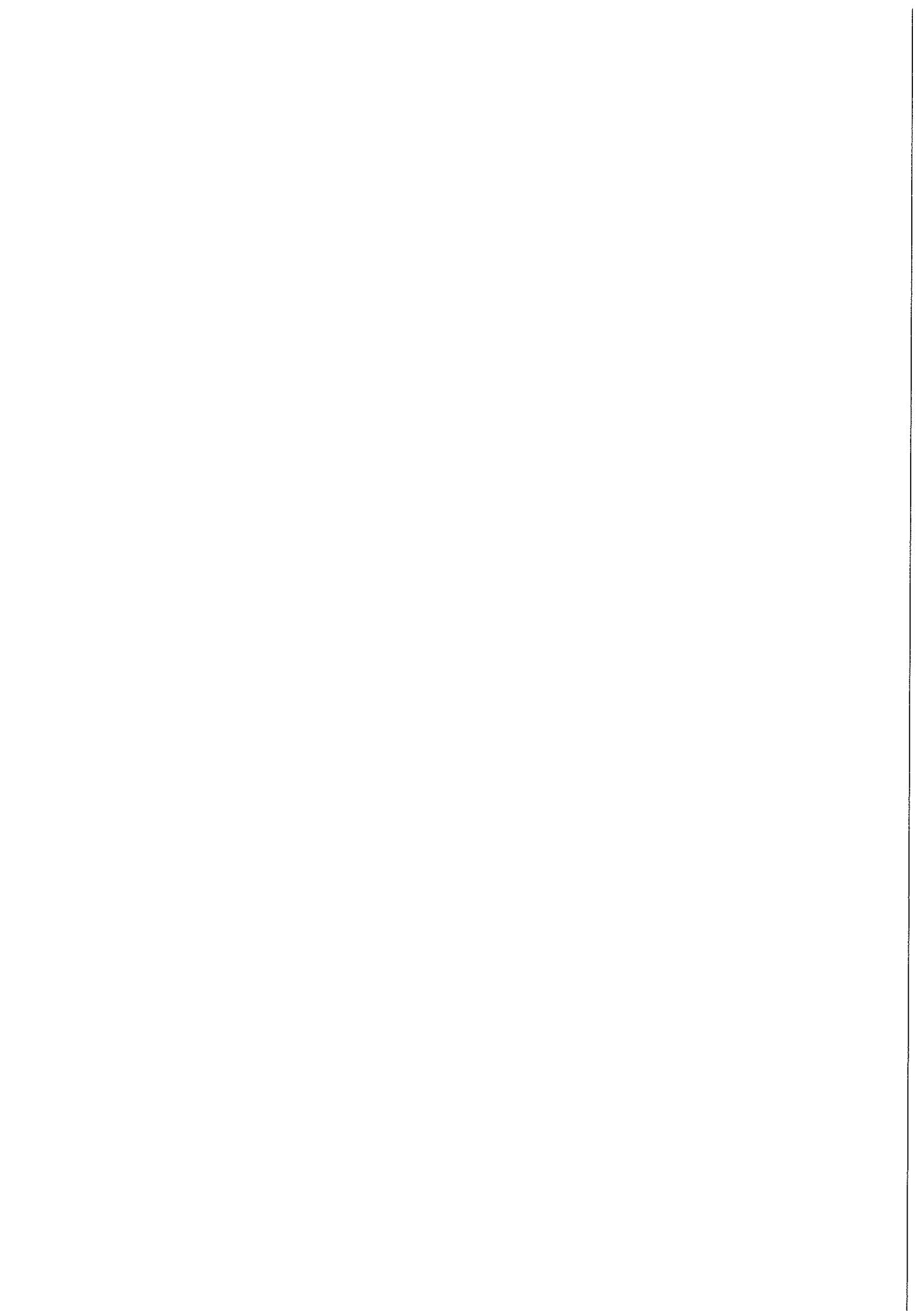
1. Phone call requested by Airbnb to discuss further engagement with Short Term Lets Delivery Group ("the Group").
2. [Redacted] explained that the approach taken by the Group would be to identify the principles and requirements for any regulation before progressing to solutions. Marie accepted that Edinburgh required additional regulation but was keen on evidence-based solutions.
3. [Redacted] noted that his top priority was to get resourcing in place quickly to support the Group and to produce a discussion document which would form the basis for discussion with Airbnb and others in a coherent and consistent manner.
4. The letter from Airbnb to Mr. Stewart requesting a meeting was noted. [Redacted] suggested that Ministers were likely to want to be engaging with stakeholders directly in the stakeholder engagement phase of policy development.
5. [Redacted] was interested in the "counterfactual": what was the difference that Airbnb and others had made to the short-term letting market, compared with how it would have grown had they not been present. He was also interested in learning from international experience. Marie noted they had a lot of experience from around the world and offered to share international examples as part of the discussion at the next catch up.
6. [Redacted] considered that it was unlikely that legislation would be ready to go to Parliament within the 12 months of the Programme for Government (i.e. before September 2019). He reiterated that he was anxious that whatever framework was put in place allowed local authorities to opt into it but, where they did, required a certain consistency to make it easier for platforms, hosts and visitors.

### Actions

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7. It was agreed that we would speak again in around one month, with international examples on the agenda.

[Redacted]  
September 2018





T: 0300 244 4000  
E: scottish.ministers@gov.scot



Airbnb  
[Redacted]

Our ref: 2018/0030381 & 2018/0029381  
4 October 2018



Many thanks for your letters to me and Mr Mackay on 30 August, requesting meetings to discuss the economic impact of Airbnb in Scotland, and outlining the benefits of short term lets for tourism and the Scottish economy. I am responding for myself and on behalf of Mr Mackay.

I welcome your engagement with my officials and your constructive approach to assisting the Scottish Government develop policy in this area. As I am sure you appreciate, we want to take advantage of the opportunities presented by short term lets, whilst making sure this is balanced with the needs of local communities.

The Short Term Lets Delivery Group is preparing to engage widely with stakeholders on developing our approach to short term letting. I, and my Ministerial colleagues, will want to hear what Airbnb and other stakeholders have to say, as part of that engagement. My officials will advise you of the opportunities for Airbnb to be a part of that engagement in due course.

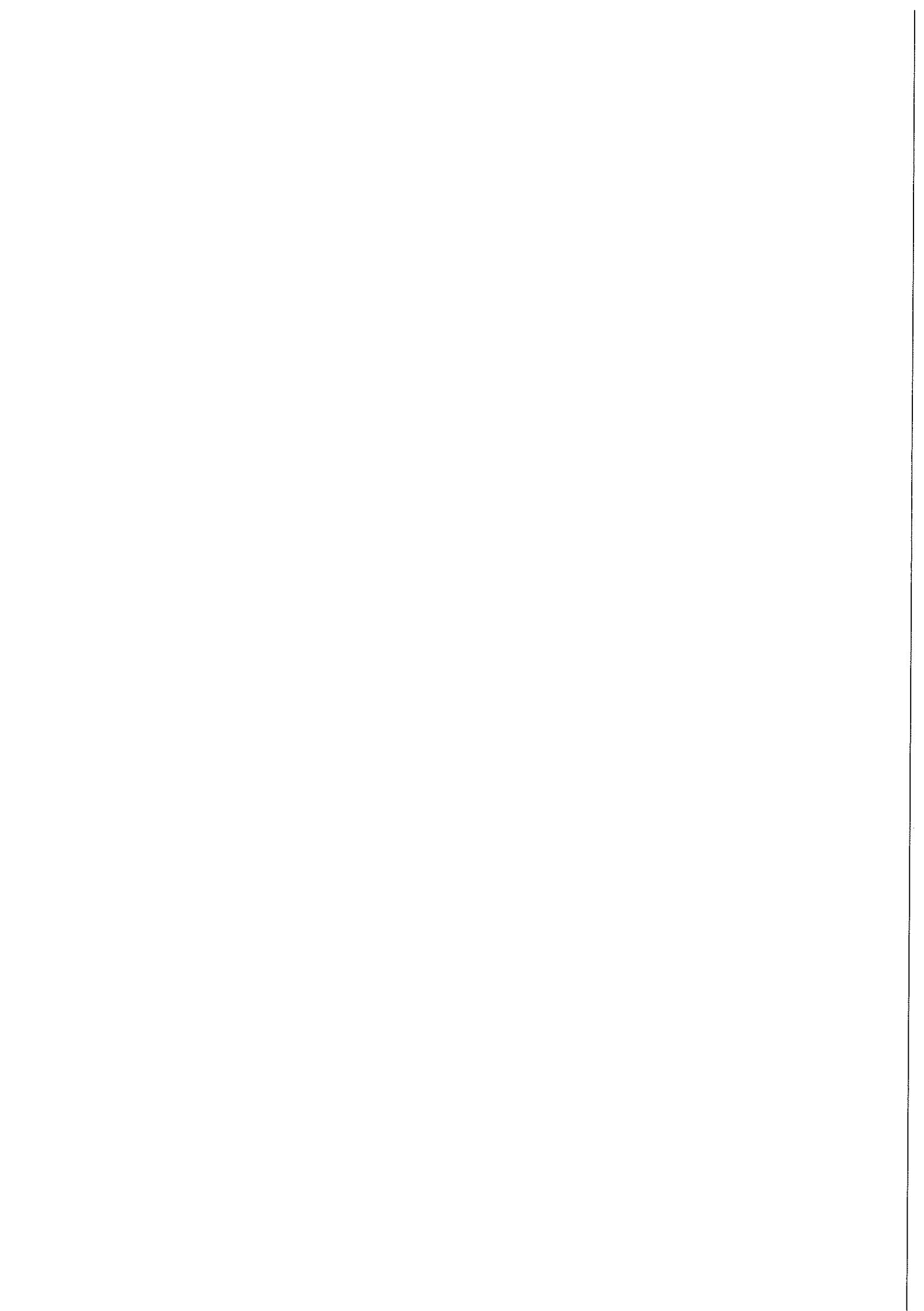
Thank you again for your letters.

*Yours sincerely*  
Kevin Stewart

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)





**From:** [Redacted]  
**Sent:** 25 October 2018 09:37  
**To:** Cabinet Secretary for Culture, Tourism and External Affairs <[CabSecCTEA@gov.scot](mailto:CabSecCTEA@gov.scot)>  
**Cc:** [Redacted] >; [Redacted] [Redacted] >; [Redacted] >; [Redacted] >; [Redacted]  
**Subject:** RE: Meeting Request - Airbnb

[Redacted]

As requested, PS Minute re Airbnb Meeting request via Halogen PR.

Halogen PR Email of 23 October 2018 refers

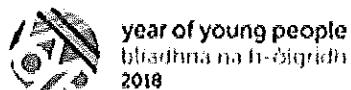
[Redacted]

[Redacted]  
Tourism and Major Events Division  
Directorate for Culture, Tourism and Major Events  
Area 2G - South  
Victoria Quay  
EDINBURGH EH6 6QQ

Telephone - 0131 244 [Redacted]

TypeTalk calls welcome

Mobile - [Redacted]



**From:** [Redacted]  
**Sent:** 24 October 2018 11:32  
**To:** Cabinet Secretary for Culture, Tourism and External Affairs <[CabSecCTEA@gov.scot](mailto:CabSecCTEA@gov.scot)>  
**Cc:** [Redacted] [Redacted]  
**Subject:** RE: Meeting Request - Airbnb

Hi [Redacted]

Yes, we can. I've passed this onto [Redacted] who has been leading on the shared tourism economy of which AirBnB is a key part.

[Redacted]

**From:** [Redacted] On Behalf Of Cabinet Secretary for Culture, Tourism and External Affairs  
**Sent:** 24 October 2018 11:25  
**To:** [Redacted]  
**Cc:** Cabinet Secretary for Culture, Tourism and External Affairs <[CabSecCTEA@gov.scot](mailto:CabSecCTEA@gov.scot)>  
**Subject:** FW: Meeting Request - Airbnb

[Redacted]

Would your team be able to provide a PS Minute please.

Regards,

[Redacted]

[Redacted]

Office of Fiona Hyslop, Cabinet Secretary for Culture, Tourism and External Affairs  
Scottish Government, Room 2N.15, St Andrew's House, Regent Road, Edinburgh,  
EH1 3DG | [www.gov.scot](http://www.gov.scot)

**From:** [Redacted]

**Sent:** 23 October 2018 09:41

**To:** Cabinet Secretary for Culture, Tourism and External Affairs <[CabSecCTEA@gov.scot](mailto:CabSecCTEA@gov.scot)>

**Subject:** Meeting Request - Airbnb

Dear Fiona Hyslop MSP,

Further to our previous request, as attached, I am writing on behalf of Airbnb  
[Redacted] to request a meeting with you to discuss the contribution Airbnb can make  
to Scottish tourism and the Scottish Economy.

[Redacted] are available to meet on the 8<sup>th</sup> and 15<sup>th</sup> of November at whatever time is  
most convenient for you.

Please feel free to ask if you have any questions.

Kind regards,



[Redacted]

[Redacted] | Halogen Communications

Mobile: [Redacted]

Email: [Redacted]

UK: [Redacted]

T: [Redacted]

USA: [Redacted]

T: [Redacted]

[Redacted]

## SHORT TERM LETS – MEETING WITH SHORT TERM ACCOMMODATION ASSOCIATION - 1 NOVEMBER 2018

**STAA:** [Redacted] (STAA), [Redacted] (Aisrorted), [Redacted] (SpotHost)

### **Scottish Government:**

[Redacted] (Housing), [Redacted] (Tourism), [Redacted] (Planning)

**SG-** Explained Planning (Scotland) Bill position and potential limitations on action on the amendment at stage 3 – e.g. further amendment to refine/ remove.

Key point is how much progress the Short Term Lets Delivery Group can demonstrate before Stage 3 to demonstrate to MSPs' and others' the Scottish Government's commitment to take action. Stakeholders also have a role to play in showing confidence in the work of the Group.

Key to the Scottish Government's approach is identifying the desired outcome and then the solution, hence the need to speak to stakeholders and gather evidence first.

**STAA** – Happy with STLDG approach. They had met MSPs Graham Simpson (GS) and Andy Wightman (AW) that morning (and were to meet Labour party MSPs that afternoon). They advised that GS and AW felt things were not moving quickly enough.

Their members are mostly people renting a second property – not major players. These parties are not addressed in the amendment's exemptions from the new requirement for planning permission.

Exemption around those renting a sole or main residence should be extended and create a distinction between 'amateur' and 'commercial' operators

GS and AW recognise the amendment needs changes. They believe AW is open to amendments around extending the exemption as indicated, and to introducing definitions relating to the number of days properties are let on a short term basis.

STAA are concerned about calls for licensing beyond a registration type scheme, as local authorities with devolved power may pursue outright bans on short term letting in certain areas. STAA prefer a national scheme which authorities can relax if appropriate in their areas. Referred to the situation in London where boroughs can exempt themselves from the 90 day rule in planning.

**SG** – AW wants to meet [Redacted], so there will be a chance to see what outcome AW is seeking and whether there is anything the SG could do to persuade him to withdraw his amendment, and allow the Delivery Group to identify any legislative solutions.

### **Actions**

1. [Redacted] to provide details of the four 'personas' used by Aisrorted to classify clients who short term let: those working abroad temporarily but for no fixed

period; older couple with second property; professional landlord filling gaps between longer term tenancies with ST let; and those away regularly at weekends or on trips so short, intermittent periods during which ST let possible.

2. [Redacted] – to send data on numbers involved in renting secondary residences.
3. [Redacted] – to send any further STAA thoughts on how the provision in the Bill might be changed at Stage 3 to meet everyone's requirements.

[Redacted] (SG Planning)  
2 November 2018



T: 0300 244 4000  
E: [scottish.ministers@gov.scot](mailto:scottish.ministers@gov.scot)

[REDACTED]  
[REDACTED]  
Halogen Communications  
[REDACTED]

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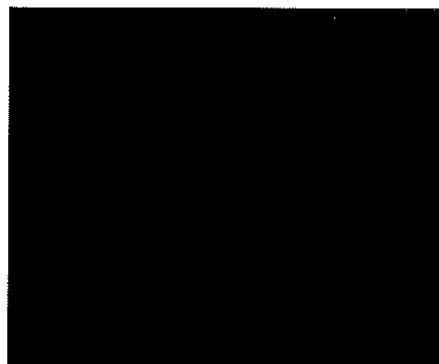
Your ref:  
Our ref: A22559134  
07 November 2018

Thank you for your email of 23 October inviting the Cabinet Secretary to meet with [REDACTED]  
[REDACTED] from Airbnb on either the 8<sup>th</sup> or 15<sup>th</sup> November.

I am afraid that due to diary pressures the Cabinet Secretary will be unable to meet with them on either of the suggested dates.

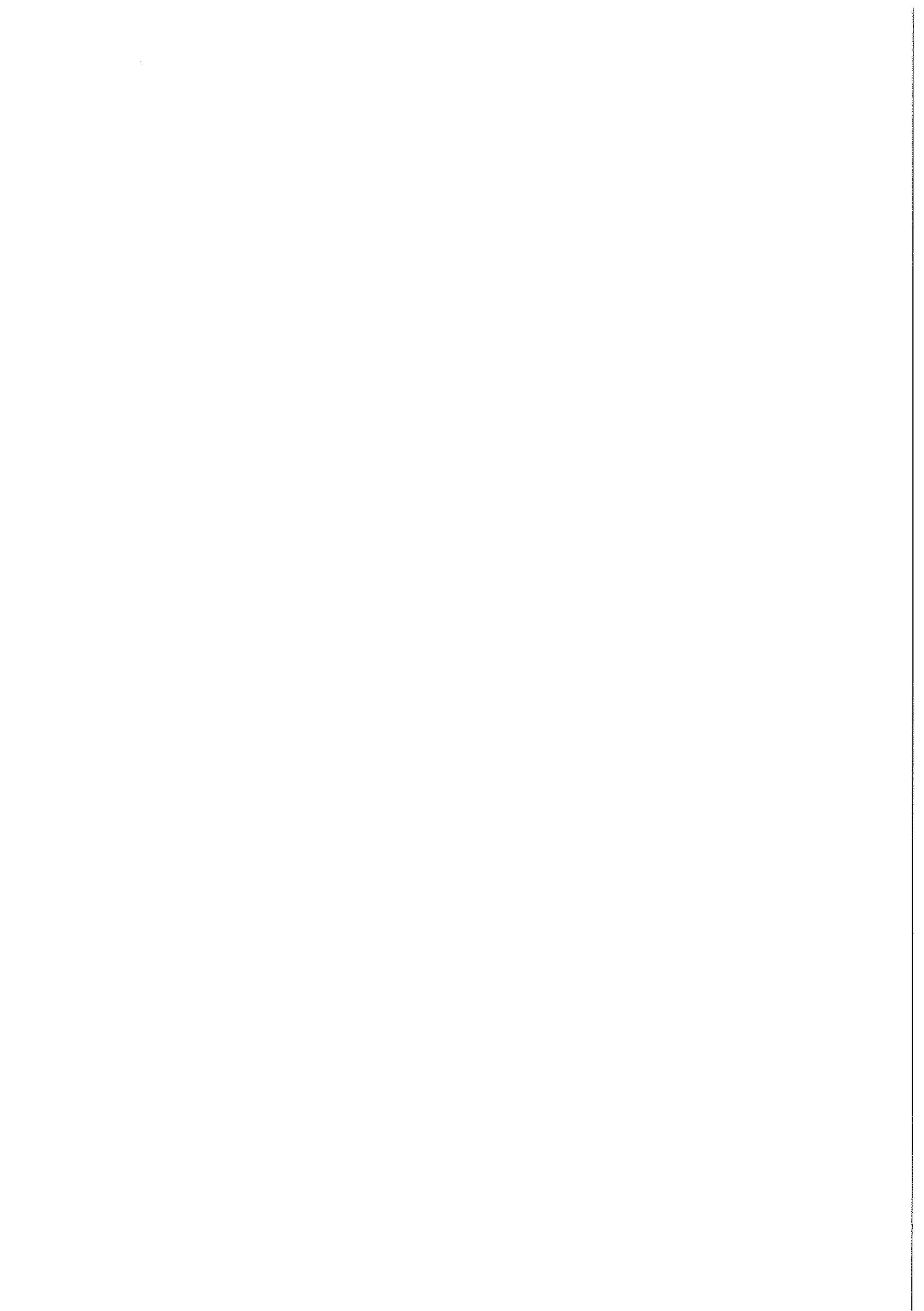
Ms Hyslop has asked me to stress that the Scottish Government wishes to ensure that Scotland is able to take advantage of the opportunities of the collaborative economy, ensuring that proportionate and appropriate regulations and enforcement are in place.

As such she notes that Officials from the Scottish Government Short Term Lets Delivery Group hold regular meetings with the Short Term Accommodation Association, the most recent on 1<sup>st</sup> November.



Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG  
[www.gov.scot](http://www.gov.scot)





20 NOV 2018

RECEIVED

28 NOV 2018

Dear Nicola Sturgeon MSP,

### Scottish Government's Planning (Scotland) Bill on Short-Term Rental Regulation

We are contacting you following the decision by the Scottish Parliament's Local Government and Communities Committee to agree to Amendment 45, *Meaning of "development": use of dwellinghouse for short-term holiday lets*, at their meeting on 24<sup>th</sup> October 2018.

Airbnb supports fair and proportionate regulation of the short-term letting sector, which is why we first proposed a regulatory solution to the Scottish Government in November 2017 (see attached for more details).

However, Airbnb cannot support such overly restrictive regulation as proposed in the Planning Bill, which would affect ordinary people looking to share their homes, as well as Scotland's flourishing tourism industry. Our new UK Insights Report, which is enclosed with this letter, shows that hosts and guests generated £569m for the Scottish economy last year – this amendment puts that positive contribution at risk and will not provide the clear and fair rules that Scotland needs.

Overall, Airbnb believe the following points should be regarded as paramount:

1. **There should not be a one-size fits all approach to regulating short-term lets in Scotland.** Regulation should be bespoke for Edinburgh, taking into account the specific issues in the city on housing supply and the capital's position as a major world tourist destination, rather than applying blanket restrictions on hosts across Scotland, including rural areas which vastly benefit from a vibrant local tourism economy.
2. **The Scottish Government's Short-Term Let Delivery Group should be able to take forward its plan of work.** This programme of evidence-gathering and engagement, as set out in the Scottish Government's response to the Scottish Expert Advisory Panel on the Collaborative Economy report, will ensure that an appropriate balance is struck between local communities and supporting tourism, and no permanent measures should be brought forward until it presents its findings.
3. **An evidence-based approach towards regulation is crucial.** Homesharing is not the primary driver of Scotland's housing concerns. In fact, in Edinburgh, entire home listings on Airbnb represent less than 2.5% of housing stock in the city. 41% of hosts share their spare room, and only 9% of all listings are available for over 180 nights a year. Across the rest of Scotland this significantly decreases, with entire home listings on Airbnb representing just 0.6% of housing stock.

As a responsible industry player, we have been actively participating in discussions on clear homesharing rules in Edinburgh. We want to establish clear, unambiguous and evidence-based boundaries between non-professional homesharing, that has a negligible impact on housing supply, and unwelcome short-term commercial letting activity.

However, primary legislation through the Planning (Scotland) Bill is not most appropriate means to regulate short-term lets. Every city and locality is different and therefore needs to approach challenges in different ways. We have detailed several recommendations which outline potential policy solutions to local challenges, including a programme for work across Scotland and a tailored solution for short-term lets in Edinburgh. Please find more information on our solution attached.

Airbnb look forward to working with policymakers towards finding a evidence-based solution for Edinburgh that protects the rights of ordinary people to share their homes and one that gives them legal certainty. We urge you to vote against this amendment and are ready to meet with you to discuss how we can work together to ensure that short-term lets remain at a sustainable level in Scotland.

Yours sincerely,



Airbnb



### Airbnb continues to work with Scotland for fair home sharing regulation

Over the past year, Airbnb has continually engaged with the Scottish Government and Edinburgh City Council as well as participating on the Scottish Expert Advisory Panel on the Collaborative Economy to champion fair, clear and effective home sharing rules as the leading responsible player in the industry. In 2018, we're doubling our efforts to work with our host community and the government to ensure home sharing can continue to grow responsibly.

Home sharing is great for Scotland. On average, Scottish hosts earn £3,600 a year via the platform and typically share their space for 38 nights per year, which equates to 3 nights per month. This is lower than the UK average of 50 nights a year. This is just some of the information we've included in our submission to the Scottish Expert Advisory Panel on the Collaborative Economy.

As Edinburgh continues to look for what the best regulations for short-term rentals might be, unlike other players, Airbnb wants to champion this effort by supporting Government and City Council officials with information that will better help them to craft effective home sharing rules that work for all, because it's the right thing to do.

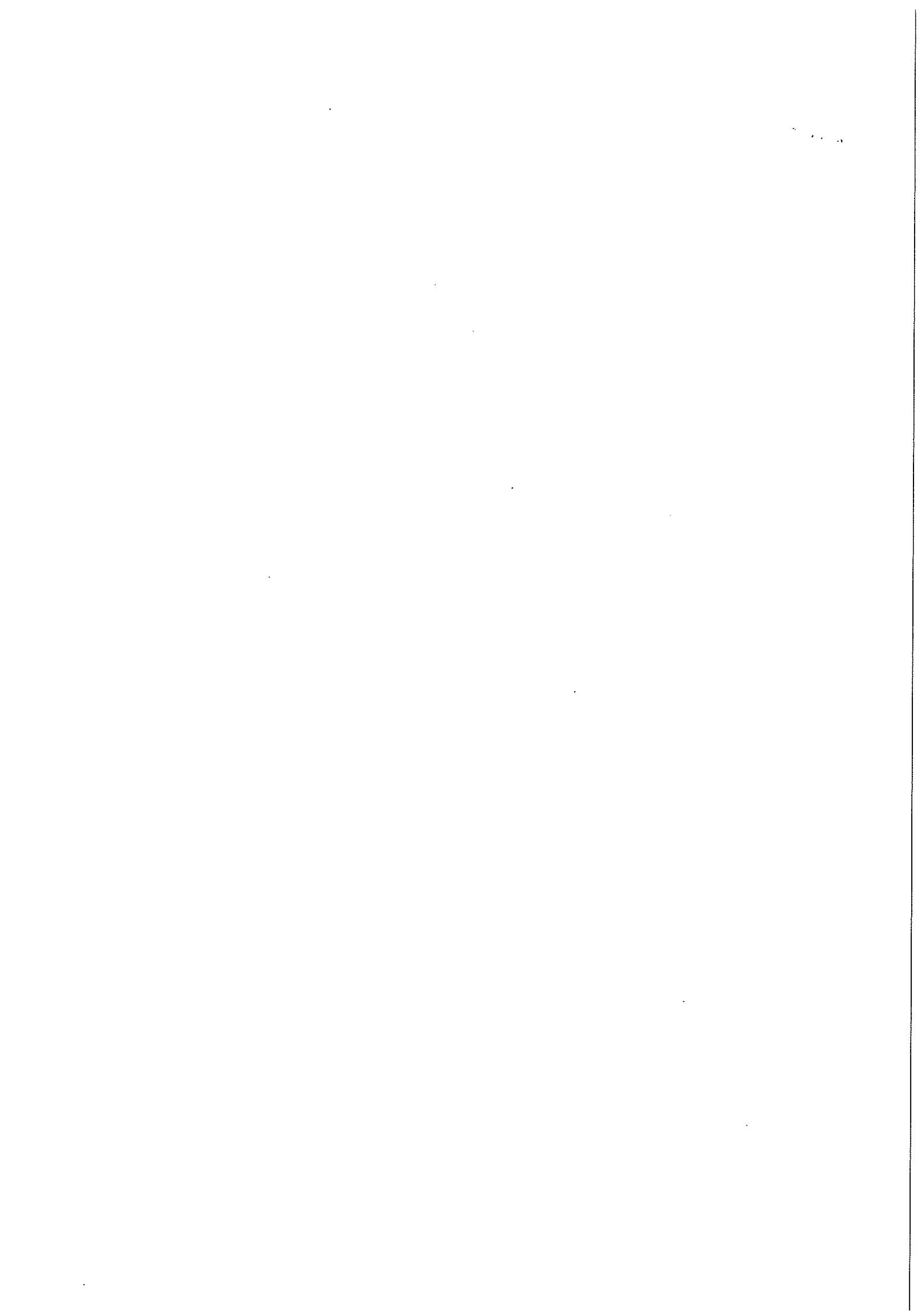
With 496,000 arrivals in the city, Edinburgh was the most popular destination in Scotland for guests in the past year. In addition to some of the country's richest landmarks, Scotland's capital is home to 12 different festivals throughout the year. Last year, Festival Fringe, which hosted nearly 3,400 performers over a three-week period, broke box office attendance figures with 2.7 million tickets sold (a 9% increase from 2016), illustrating the growing popularity among visitors.

Because Edinburgh enjoys periods of seasonal tourism with peaks observed over key months such as August (when Festival Fringe occurs) or during the Christmas season, we believe that in order to be effective, home sharing regulation must be specific and localised to Edinburgh. This will mean hosts on Airbnb can continue to provide accommodation alternatives for visitors coming to the city, ensuring a fair and healthy tourism offer in Edinburgh.

If excessively restrictive regulations were to be brought in, it would have a big impact for everyday citizens across Scotland and Edinburgh. [REDACTED] a host in Leith notes that restrictive regulation would negatively impact her as a home sharer adding that, "I'd have to close my room and despite the obvious income drop from a wasted space in my home, I'd have less money to feed into my community and local businesses I'm now able to support."

[REDACTED] a pensioner and host in Duddingston who hosts to supplement her state pension and modest savings also expressed concern on overly restrictive regulation being applied to home sharers such as herself. "Heavy restriction across Scotland and Edinburgh would mean two things for me: One, I would be worse off financially which would curtail my enjoyment of life considerably. It would push me back into the workforce, which at 65 would be difficult. Two, I would feel lonely and isolated, as I've loved meeting people of all ages and many nationalities who come and stay with me."

It is apparent that Edinburgh needs clear home sharing rules, not just to protect home sharers and uphold the positive aspects that it entails—a boost in income or the ability to meet people from other areas—but to also protect against unauthorised activity and deter bad actors. We look forward to working with all parties to establish fair, simple and transparent rules for home sharers.



## SHORT TERM LETS MEETING WITH AIRBNB – 29 NOVEMBER 2018

Scottish Government:

[Redacted]  
[Redacted]  
[Redacted]

Airbnb:

[Redacted] – Airbnb [Redacted]  
[Redacted] – Airbnb [Redacted]  
[Redacted] – [Redacted] Airbnb  
[Redacted] – Halogen [Redacted]

### Airbnb

They have been in discussion with STAA and the Association of Scottish Self Caterers – to develop a cross sector policy position on Andy Wightman MSP's amendment 45 (Now Section 11B of the Planning (Scotland) Bill).

Airbnb support the Scottish Government's approach to the issue, as regards evidence-based policy making and the Short Term Lets Delivery Group. They are concerned amendment pre-empts this approach.

The sector's position is that development of rules, and especially national rules, has to be a consultative process. They argue there is no evidence of long term impact of short term letting on housing supply across Scotland. They recognise Edinburgh has problems. They see Amendment 45 as a blanket approach regardless of local positions.

They see the approach to regulating change of use should only occur in areas with demonstrable housing shortage with the detail of how to establish this being put in regulations.

They have drafted two alternative amendments with elements around clarification and tightening language and more clarity on who is caught by it/ affected by it.

They want the Scottish Government approach to be 'honoured', and the amendment should be changed accordingly.

Airbnb referred to the need for engagement with the wider sector of which they are only a part, and a role for STAA, of which they are a member.

Airbnb offered to arrange discussion events with users and to support an industry roundtable, both of which SG indicated would be useful in the context of the STLDG stakeholder engagement, which would likely be in play in the Spring, depending on Ministerial clearance of the STLDG work programme.

**Action point:** Airbnb will share their draft amendments with SG, the cross-sector policy position and their proposed handling (as in getting the amendments before the Parliament).

### **Scottish Government**

New team leader has been appointed on the short term let policy side and we are putting place analytical support.

Our next step is to develop an approach to engagement and research that will deliver on the programme for Government commitment and get Ministerial approval for that approach.

Explanation of stage 3 and timing, which is not in SG hands, but we are seeking late March/ Early April to start in order to deal with the significant number of amendments. SG also pointed to the wider political position beyond Planning (e.g. budget vote issues).

In terms of the impact of the Bill on the STLDG timetable, SG want to make as much progress as possible with STLDG before Stage 3 of the Bill starts.

SG indicated any help with statistical information on the sector and its distribution and growth would be helpful, not least in developing a revised financial memorandum, post Stage 2.

SG welcomed Airbnb's offer of help on information about the sector, but noted SG's need to be open and transparent. SG need to develop an understanding of the situation with short term lets and the effect of proposed legislation and communicate that more widely.

SG described in broad terms the likely content of a discussion paper to gather stakeholder views on the issues: identifying problems and requirements; establishing principles for solutions; and then identifying and piloting solutions from these foundations.

Reference was made to [Redacted] forthcoming meeting with Andy Wightman MSP on 10 December.

**Action:** SG to provide information on the timing and process around handling Stage 3 amendments to Airbnb.

[Redacted]  
December 2018